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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ADVANCED MICRO DEVICES, INC.,
et al.,

Plaintiffs,

v.

LG ELECTRONICS, INC.,
et al.,

Defendants.

Case No. 3:14-cv-1012-SI

**ADDENDUM TO THE STIPULATED
PROTECTIVE ORDER FOR LITIGATION
INVOLVING PATENTS, HIGHLY
SENSITIVE CONFIDENTIAL
INFORMATION AND/OR TRADE
SECRETS**

WHEREAS, Plaintiffs Advanced Micro Devices, Inc., *et al.*, and Defendants LG Electronics, Inc., *et al.*, hereafter referred to as “the Parties,” believe that certain information belonging to Non-Party Imagination Technologies Limited is or will be encompassed by the discovery demands of the Parties and/or the disclosure requirements of the Rules of Practice for Patent Cases before the Northern District of California, and that such information contains trade secrets, confidential business information, and/or other proprietary information of Imagination Technologies Limited, the Parties seek the entry of this Addendum to the Stipulated Protective Order (Docket Entry No. (“D.E.”) 120) as follows:

17. Imagination's Source Code.

(a) Non-Party Imagination Technologies Limited ("Imagination"), or Defendants LG Electronics, Inc., Ltd., LG Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc., (collectively, "LG"), may designate documents, information, or things as "HIGHLY CONFIDENTIAL – IMAGINATION SOURCE CODE," which shall refer to the confidential, proprietary, and/or trade secret source code of Non-Party Imagination, and which shall also be referred to in this Paragraph 16 as "Imagination Source Code" or "Imagination's Source Code."

(b) For the avoidance of doubt, the additional protections set forth in this Paragraph 16 shall apply only to HIGHLY CONFIDENTIAL – IMAGINATION SOURCE CODE produced by LG or Imagination. Nothing in this Paragraph 16 shall apply to non-Imagination Source Code produced under Paragraph 9 of the Stipulated Protective Order entered in this case (D.E. 120), and nothing in this Paragraph 16 is intended to, or does, alter any of the terms of Paragraph 9 of the Stipulated Protective Order (D.E. 120), except as expressly identified below.

1. Materials designated as "HIGHLY CONFIDENTIAL – IMAGINATION SOURCE CODE," shall be given all of the protections afforded to "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" information and "HIGHLY CONFIDENTIAL – SOURCE CODE" information under the Stipulated Protective Order (D.E. 120), including the Prosecution Bar set forth in Paragraph 8 and Source Code protections set forth in Paragraph 9. Materials designated as "HIGHLY CONFIDENTIAL – IMAGINATION SOURCE CODE" may only be disclosed to, and are only reviewable by, the individuals to whom "HIGHLY CONFIDENTIAL – SOURCE CODE" information may be disclosed, as set forth in Paragraphs 7.3 and 7.4 of the Stipulated Protective Order (D.E. 120).

2. A Party that seeks to disclose to an Expert (as defined in the Stipulated Protective Order (D.E. 120)) any information or item that has been designated "HIGHLY CONFIDENTIAL – IMAGINATION SOURCE CODE," pursuant to Paragraph 7.3(b) of the Stipulated Protective Order, must make the written request as required by Paragraph 7.4(a)(2) to the Designating Party, and if the Designating Party is a party other than Non-Party Imagination, then also to

1 Imagination's outside counsel, which, for purposes of this Addendum only, is as follows:

2 Blaney Harper
3 JONES DAY
4 51 Louisiana Avenue, NW
5 Washington DC 20001-2113
6 Office +1.202.879.7623
7 bharper@jonesday.com

8 Imagination will thereafter have the authority to object in writing to the notice and/or
9 request by the Receiving Party relating to Imagination's Source Code as if
10 Imagination were the Producing Party pursuant to Paragraph 7.4 of the Stipulated
11 Protective Order (D.E. 120).

12 3. Access to and the production of "HIGHLY CONFIDENTIAL – IMAGINATION
13 SOURCE CODE" shall follow the procedures set forth in Paragraph 9(a)-(f) of the
14 Stipulated Protective Order (D.E. 120), with the following additions and/or
15 exceptions:

- 16 i. The Parties shall meet-and-confer regarding any paper copies of Imagination's
17 Source Code requested by the Receiving Party pursuant to Paragraph 9(e) of the
18 Stipulated Protective Order (D.E. 120) that exceed either 50 continuous pages
19 or ten (10) percent or more (whether continuous or discontinuous) of the
20 Imagination Source Code for any given software release.
- 21 ii. The Receiving Party may not bring any electronic devices into the secured
22 room of Paragraph 9(c) of the Stipulated Protective Order (D.E. 120),
23 including, but not limited to, cameras, cellular telephones, laptop computers,
24 and/or other electronic recording media.
- 25 iii. Paper copies of "HIGHLY CONFIDENTIAL – IMAGINATION SOURCE
26 CODE" may only be transported by the Receiving Party by a person authorized
27 under Paragraphs 7.3(a), (b), and (d) of the Stipulated Protective Order (D.E.
28 120), and provided to another person authorized under the same Paragraphs.
Moreover, no more than 50 continuous pages or ten (10) percent (whether
continuous or discontinuous) of the Imagination Source Code for any given

1 software release, in paper copy format, may be shipped via Federal Express, or
2 other similar carrier, in any one single container. Accordingly, and for the
3 avoidance of doubt, any shipment of Imagination's Source Code in paper
4 format that exceeds the limitations above would be required to be shipped in
5 multiple containers.

- 6 iv. Any notice that the Receiving Party is required to provide to the Producing
7 Party or request that the Receiving Party is allowed to make to the Producing
8 Party under Paragraphs 6, 7, 8, and 9 (including specifically Paragraph 9(e)) of
9 the Stipulated Protective order (D.E. 120) relating in any way to Imagination's
10 Source Code shall also be simultaneously provided to Imagination's outside
11 counsel, which, for purposes of this Addendum only, is as follows:

12 Blaney Harper
13 JONES DAY
14 51 Louisiana Avenue, NW
15 Washington DC 20001-2113
16 Office +1.202.879.7623
17 bharper@jonesday.com

18 After receiving the notice and/or request from the Receiving Party, Imagination
19 will have the authority to object to the notice and/or request by the Receiving
20 Party relating to Imagination's Source Code as if Imagination were the
21 Producing Party pursuant to the Stipulated Protective Order (D.E. 120).

- 22 v. Within 60 days after the final disposition of this action, as defined in paragraph
23 4 of the Stipulated Protective Order (D.E. 120), the Receiving Party shall
24 provide Imagination's outside counsel with a copy of the "record of any
25 individual who has inspected any portion of the source code in electronic or
26 paper form" for Imagination's Source Code, which the Receiving Party is
27 required to maintain pursuant to Paragraph 9(f) of the Stipulated Protective
28 Order (D.E. 120).

1 DATED: February 3, 2017

Respectfully Submitted,

2 **ROBINS KAPLAN LLP**

3
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1 DATED: February 3, 2017

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Attorneys for Defendants LG Electronics, Inc., LG
Electronics U.S.A., Inc., and LG Electronics
Mobilecomm U.S.A., Inc.

19 SO ORDERED:

21 Dated: _____

Susan Illston, U.S. District Judge